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9

10 **UNITED STATES DISTRICT COURT**

11 **DISTRICT OF NEVADA**

12 BROOKE CARDOZA, *et al.*,

13 Plaintiffs,

14 vs.

15 BLOOMIN' BRANDS, INC., *et al.*,

16 Defendants.

CASE NO.: 2:13-cv-01820-JAD-NJK

**EXPEDITED STIPULATION AND
ORDER TO MODIFY
NOTICE OF COLLECTIVE ACTION
AND CONSENT-TO-JOIN FORMS**

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18 Pursuant to LR 7-1, Plaintiffs and Defendants (collectively, the “parties”), through and by their
19 respective counsel, hereby jointly stipulate to modify the Notice of Collective Action and Consent-to-
20 Join forms previously approved by the Court. The proposed modified Notice of Collective Action form
21 is attached as **Exhibit 1**, and the proposed modified Consent-to-Join form is attached as **Exhibit 2**.

22 The parties file this stipulation at Plaintiffs’ request in order to modify the current notice by
23 including the contact information for the third-party administrator that will furnish the Notice of
24 Collective Action and Consent-to-Join forms and receive and process the Consent-to-Join forms from
25 opt-in plaintiffs. The other minor modification to the notice includes an instruction for Spanish
26 speakers regarding how to obtain a Spanish-translated copy of the modified notice. The proposed
27 Spanish-translated copies of the modified Notice of Collective Action and the Consent-to-Join are
28 attached respectively as **Exhibits 3** and **4**. The voice recording script for Spanish speakers requesting

1 the Spanish-translated copy of the modified notice has been approved by the parties. Finally, the
2 modification to the Consent-to-Join form is solely for the third-party administrator to process returned
3 Consent-to-Join forms.

4 In sum, the modifications are purely for administrative practicality and do not modify any
5 substantive aspect of the forms previously approved by the Court's Order [ECF Doc. 151]. Plaintiffs
6 request expedited treatment of this stipulation and proposed order so that dissemination of the notice is
7 not delayed. Plaintiffs consulted with Defendants and the parties have adopted all of the proposed
8 changes.

9 IT IS SO STIPULATED.

10 Dated: February 13, 2015

WOLF, RIFKIN, SHAPIRO,
SCHULMAN & RABKIN, LLP

11 By: /s/ Justin C. Jones

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21 *Attorneys for Plaintiffs*

22 **ORDER**

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24 IT IS SO ORDERED.

25 Dated: February 17, 2015.

26 
27 UNITED STATES DISTRICT JUDGE
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1 Dated: February 13, 2015

GIBSON, DUNN & CRUTCHER LLP

2 By: /s/ Jesse A. Cripps

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8 *Attorneys for Defendants Bloomin' Brands,*
9 *Inc.; OSI Restaurant Partners, LLC; Outback*
10 *Steakhouse of Florida, LLC; OS Restaurant*
11 *Services, LLC*

12 **ORDER**

13 **IT IS SO ORDERED.**

14 Dated: _____

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16 UNITED STATES DISTRICT COURT JUDGE
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